

EXHIBIT 2

From: [Gadeir Abbas](#)
To: [Roth, Dena M. \(CIV\)](#); [Carolyn Homer](#); [Lena F. Masri, Esq.](#)
Cc: [Powell, Amy \(CIV\)](#); [Konkoly, Antonia \(CIV\)](#); [Healy, Christopher \(CIV\)](#)
Subject: Re: Elhady - order on ORI list
Date: Saturday, February 23, 2019 1:40:09 PM

No. Plaintiffs agree to abide by the terms set by Judge Anderson, not by the ones you all made up.

We're going to be spending a lot of time with the list. We'd like to view it on multiple days this week. We plan on creating work product while we're with the document, so we will have with us all the tools needed to create attorney work product. Of course, the work product that we create and that we take with us will only be for the purpose of litigating this case.

The judge ordered us to handle the material in a very specific manner. We'll do exactly as Judge Anderson ordered.

We also believe that your forthcoming supplement is an opportunity to address issues that will arise when we review the private list. We're anticipating being alarmed once we see it. Perhaps we can set up meet and confers this week on Monday, Wednesday, and Friday?

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From: Gadeir Abbas
Sent: Friday, February 22, 2019 4:39:32 PM
To: Roth, Dena M. (CIV); Carolyn Homer; Lena F. Masri, Esq.
Cc: Powell, Amy (CIV); Konkoly, Antonia (CIV); Healy, Christopher (CIV)
Subject: Re: Elhady - order on ORI list

Thanks Dena.

We'll get back to you tomorrow after we've had a chance to consider your proposal. But we

agree that it is important for the parties to establish clear expectations.

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From: Roth, Dena M. (CIV) <Dena.M.Roth@usdoj.gov>
Sent: Friday, February 22, 2019 4:36:52 PM
To: Gadeir Abbas; Carolyn Homer; Lena F. Masri, Esq.
Cc: Powell, Amy (CIV); Konkoly, Antonia (CIV); Healy, Christopher (CIV)
Subject: Elhady - order on ORI list

Gadeir –

In light of the Magistrate's order that the ORI List be restricted to viewing by Plaintiffs' counsel of record, with no copies permissible, we thought it would be useful for both parties to clarify the scope of that verbal protective order and how plaintiffs' counsel may use the information gleaned.

We were hoping we could just agree on some language to propose to the Court. Here's a draft – we're happy to discuss but we would love to get this on the docket ASAP for the Court's consideration.

Re: logistics – please advise if you are able to come to our offices at 1100 L Street NW in the afternoon on Monday, who will be coming, and what times work best for you.

(I will be offline the rest of the day today through tomorrow, so please reply all to the group)

Dena

Dena M. Roth
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